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May 13, 2025

**VIA ECF**

Hon. Nusrat J. Choudhury, U.S.D.J.  
United States District Court for the Eastern District of New York  
100 Federal Plaza, Courtroom 1040  
Central Islip, NY 11722

**Re: Deo v. Baron, et al.  
Civil Action No. 2:24-cv-6903**

Dear Judge Choudhury:

We represent defendant JPMorgan Chase Bank, N.A. ("Chase") in the above-referenced matter. Pursuant to Your Honor's May 9, 2025 Text Order, we write with regard to Chase's position as to whether this Court has lost jurisdiction over this matter in view of the United States Supreme Court's decision in *Royal Canin U.S.A., Inc. v. Wullschleger*, 604 U.S. 22 (2025) or whether the "mirror image" rule, as argued by the Financing Defendant, applies and permits this Court to retain jurisdiction.

Chase agrees with the Financing Defendants that, pursuant to the "mirror image" rule, this Court should retain jurisdiction of this matter. Chase, as a now-recently dismissed defendant from the case also venued here, *Superb Motors inc. v. Deo*, Case No. 23-cv-6188 (the "RICO Action"), agrees that the allegations asserted in this matter, including those asserted against Chase, are effectively the other side of the coin of the dispute raised in the RICO Action, i.e., whether the plaintiffs to this suit or the plaintiffs to the RICO Action are the rightful owners of certain automobile dealerships and, in turn, in control of the bank account(s) maintained by those dealerships and related entities.

Accordingly, Chase joins the Financing Defendants, and the other parties who have concurred, in respectfully requesting that the Court apply the "mirror image" rule and retain jurisdiction over this matter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Anthony C. Valenziano".

Anthony C. Valenziano

cc: All Counsel of Record (via ECF)

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